

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

SECURITIES AND EXCHANGE	)	
COMMISSION,	)	
	)	
	)	
v.	)	Case No. 14-cv-11858-NMG
	)	
TELEXFREE, INC., ET AL.	)	
Defendants	)	

**ASSENTED-TO MOTION FOR LIMITED RELIEF FROM “CONSENT ORDER  
AS TO DEFENDANT CARLOS WANZELER”**

The Defendant, Carlos Wanzeler, through undersigned counsel, moves this Court for limited relief from the Consent Order as to Defendant Carlos Wanzeler (ECF No. 101) entered on May 9, 2014, to allow the ownership and control of the business entity known as Brazilian Help, Inc. to be transferred to Katia Wanzeler. In support of this motion, Mr. Wanzeler states as follows:

1. On March 9, 2014, the Court entered the “Consent Order as to Defendant Carlos Wanzeler” (ECF No. 101), which among other things, had the effect of freezing the assets of Mr. Wanzeler.

2. On March 24, 2015, the Court entered an “Order Granting Limited Relief from Asset Freeze” (ECF No. 294), which released from the asset freeze the bank account at St. Mary’s Credit Union, held in the name of Brazilian Help, Inc.

3. Mr. Wanzeler is the sole owner of Brazilian Help, Inc. and has the sole signing authority for the bank account at St. Mary’s Credit Union.

4. Mr. Wanzeler is unable to operate and manage the business of Brazilian Help, Inc. and maintain banking relationships with financial institutions, while the SEC case is pending against Mr. Wanzeler.

5. Katia Wanzeler is the wife of Carlos Wanzeler, and Katia Wanzeler has not been accused of any wrongdoing in the SEC action or in connection with the conduct of TelexFree, Inc.

6. Mr. Wanzeler requests that the Court grant limited relief from the asset freeze order, so that ownership and control of Brazilian Help, Inc., and signing authority over the business bank account, can be transferred to Katia Wanzeler. This relief will allow the business to continue to operate.

7. The SEC assents to this motion and the relief requested.

8. A proposed order is attached to this motion.

For these reasons, Mr. Wanzeler respectfully requests that the Court grant this motion.

Dated: May 1, 2015

Respectfully submitted,  
Counsel for Carlos Wanzeler,

/s/ Paul V. Kelly  
Paul V. Kelly (BBO No. 267010)  
John J. Commisso (BBO No. 647002)  
Jackson Lewis P.C.  
75 Park Plaza  
Boston, MA 02116  
Tel.: (617) 367-0025  
Fax: (617) 367-2155  
[Paul.Kelly@jacksonlewis.com](mailto:Paul.Kelly@jacksonlewis.com)  
[John.Commisso@jacksonlewis.com](mailto:John.Commisso@jacksonlewis.com)

**Certificate of Service**

I, Paul Kelly, certify that on this date a copy of this document has been served via the Electronic Court Filing system on all registered participants.

/s/ Paul Kelly  
Paul Kelly

4815-0987-8819, v. 1